

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
SAN ANTONIO DIVISION

SHANNON PEREZ; HAROLD DUTTON, JR.  
GREGORY TAMEZ; SERGIO SALINAS;  
CARMEN RODRIGUEZ; RUDOLFO ORTIZ;  
NANCY HALL and DOROTHY DEBOSE

Plaintiffs

-and-

EDDIE BERNICE JOHNSON; SHEILA  
JACKSON-LEE and ALEXANDER GREEN;  
MEMBERS OF THE UNITED STATES  
CONGRESS

-and-

TEXAS LEGISLATIVE BLACK CAUCUS,  
TEXAS HOUSE OF REPRESENTATIVES

-and-

TEXAS STATE CONFERENCE OF NAACP  
BRANCHES; HOWARD JEFFERSON,  
JUANITA WALLACE and REV. BILL LAWSON

Plaintiff-Intervenors

v.

STATE OF TEXAS; RICK PERRY, in his official  
capacity as Governor of the State of Texas;  
DAVID DEWHURST, in his official capacity as  
Lieutenant Governor of the State of Texas;  
JOE STRAUS, in his official capacity as Speaker  
of the Texas House of Representatives;  
HOPE ANDRADE, in her official capacity as  
Secretary of State of the State of Texas

Defendants

CIVIL ACTION NO.  
11-CA-360-OLG-JES-XR  
[Lead case]

MARGARITA V. QUESADA; ROMEO MUNOZ; )  
MARC VEASEY; JANE HAMILTON; )  
LYMAN KING; and JOHN JENKINS )

Plaintiffs )

v. )

RICK PERRY, in his official capacity as Governor )  
of the State of Texas; and HOPE ANDRADE, )  
in her official capacity as Secretary of the State )  
of the State of Texas )

Defendants )

CIVIL ACTION NO.  
SA-11-CA-592-OLG-JES-XR  
[Consolidated case]

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JOHN T. MORRIS )

Plaintiff )

v. )

STATE OF TEXAS; RICK PERRY, in his official )  
capacity as Governor of the State of Texas; DAVID )  
DEWHURST, in his official capacity as Lieutenant )  
Governor of the State of Texas; JOE STRAUS, )  
in his official capacity as Speaker of the Texas )  
House of Representatives; and HOPE ANDRADE, )  
in her official capacity as Secretary of State )  
of the State of Texas )

Defendants )

CIVIL ACTION NO.  
SA-11-CA-615-OLG-JES-XR  
[Consolidated case]

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EDDIE RODRIGUEZ, MILTON GERARD )  
WASHINGTON, BRUCE ELFANT, ALEX )  
SERNA, SANDRA SERNA, BETTY F. LOPEZ, )  
DAVID GONZALEZ, BEATRICE SALOMA, )  
LIONOR SOROLA-POHLMAN; ELIZA )  
ALVARADO; JUANITA VALDEZ-COX; )  
JOSEY MARTINEZ; NINA JO BAKER; )  
TRAVIS COUNTY and CITY OF AUSTIN )

Plaintiffs )

v. )

CIVIL ACTION NO.  
SA-11-CA-635  
[Consolidated case]

RICK PERRY, in his official )  
capacity as Governor of the State of Texas; DAVID )  
DEWHURST, in his official capacity as Lieutenant )  
Governor of the State of Texas; JOE STRAUS, )  
in his official capacity as Speaker of the Texas )  
House of Representatives; and HOPE ANDRADE, )  
in her official capacity as Secretary of State )  
of the State of Texas; STATE OF TEXAS; )  
BOYD RICHIE, in his official capacity as Chair )  
of the Texas Democratic Party; and STEVE )  
MUNISTERI, in his official capacity as Chair of )  
the Republican Party of Texas )  
 )  
Defendants )  
 )

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**AFFIDAVIT OF DR. MICHAEL P. MCDONALD**

My name is Michael P. McDonald. I am an expert witness designated by Plaintiffs MARGARITA V. QUESADA, ROMEO MUNOZ, MARC VEASEY, JANE HAMILTON, LYMAN KING, JOHN JENKINS, KATHLEEN MARIA SHAW, DEBBIE ALLEN, JAMAAL R. SMITH, and SANDRA PUENTE, as well as the TEXAS DEMOCRATIC PARTY and its Chairman BOYD RICHIE in the above referenced case.


I hold a Ph.D. in Political Science from the University of California, San Diego, and I hold a B.S. in Economics from the California Institute of Technology. A true and correct copy of my resume is attached hereto as Exhibit "C" as a part of my report. The following report, a true and correct copy of which is attached as Exhibit "A" and incorporated herein for all purposes contains a summary of my opinions and conclusions. A true and correct copy of the appendix to the report is attached as Exhibit "B."

Signed this 1st day of August, 2011.

  
MICHAEL P. MCDONALD

SWORN TO AND SUBSCRIBED BEFORE ME, on this 1st day of August, 2011, to which I certify my hand and official seal.



  
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